REMARKS

1. Amendment to the specification:

All instances of --10"-- in the specification have been corrected to --10'-- to harmonize the disclosure with Fig.4. No new matter is entered.

Withdrawal of the objection to the specification is requested.

2. Rejection of claims 1-5, 7, 8, 10, 12, and 15-17 under 35 U.S.C. 102(a) as being anticipated by Cheng (US Pub. 2002/0010827):

Claim 1 is amended to include all limitations of claim 2, which is cancelled. Claim 1 is also amended to explicitly recite that the wherein clause pertains to the function of the security program, such amendment being for clarification only. No new matter is entered.

Regarding the rejection to claim 1, it should be noted that Cheng uses the term "pre-installed" (see paragraph [0022] for instance) to refer to software installed on the computer, not to software installed on the flash memory device 10. The applicant's use of the term "pre-installed" is regarding the security program installed in the claimed flash memory device.

Regarding the rejection to claim 2, the examiner states that "the security program is run in order to verify that the password input by the user is correct". The element in Cheng that executes the program is unclear in this statement. Moreover, this is not what was recited in applicant's claim 2, which specifically stated that "the security program is executed by the computer."

Regarding execution of the security program, in paragraph [0018] Cheng teaches that the micro-controller 3 compares passwords and controls data flow to and from the flash memory 4. Later in the same paragraph, Cheng discloses that the

"micro-controller 3 can automatically retrieve passwords from the installed software [installed on the computer] to compare with passwords stored in the flash memory to verify [authorization]." These are functions that the examiner considers to be executed by the program in Cheng's ROM 5. Thus, clearly, Cheng's approach is to have the micro-controller 3 execute the security program that is stored in the ROM 5.

Actually, Cheng's micro-controller 3 is the initiator of many security related functions, see paragraph [0026] "...the micro-controller 3 starts 39 the software installation from the flash memory 4 to the computer," and "The micro-controller 3 then checks 43 whether the software installation is complete." Thus, it can be seen that in addition to executing the security program, Cheng's micro-controller 3 manages much of the operation of the flash memory device 10.

The applicant contends that the invention recited in the amended claim 1 (original claim 2) is significantly different from Cheng's device in that the computer executes the pre-installed security program, and that the security program controls the microcontroller. As discussed above, Cheng's micro-controller 3 executes the program in the ROM 5. In contrast, the amended claim 1 recites "the security program being executed by the computer when the microcontroller receives flash memory access requests from the connection port". This is supported in the applicant's disclosure by Step 102 of paragraph [0028], for instance.

This is a significant difference from Cheng. The security program being executed by the computer is precisely what allows the security program to be written in a cross-platform language such as HTML (claim 14). This is a stated advantage of the claimed invention. Cheng's device instead relies on the user to install driver software, driver software being well known to be platform specific. See Cheng's paragraph [0023], "The device 10 is typically supplied with driver software that is loaded by the user onto the computer prior to set-up of the device".

In summary, Cheng's security program is executed by the micro-controller, whereas the security program of the amended claim 1 is executed by the computer, thereby

allowing a cross-platform language to be used.

In accordance with the amendment to claim 1, claim 15 is amended to recite "executing the security program with a computer to which the connection port is temporality connected". This limitation adds no new matter and should not require a new search or additional consideration since the claimed method is clearly for operating the claimed device.

Reconsideration of claims 1, 3-5, 7, 8, 10, 12, and 15-17 is requested in view of the amendments to claims 1 and 15 and the explanation above. Claims 3-5, 7, 8, 10, 12, and 16-17 are dependent and should be allowed if the corresponding independent claims are found allowable.

3. Rejection of claim 6 under 35 U.S.C. 103(a) as being unpatentable over Cheng in view of Kobayashi et al. (US Pub. 2004/0042363):

Reconsideration of claim 6 is requested in view of the amendment to claim 1 and the explanation in item 2 above. Claim 6 is dependent and should be allowed if the corresponding independent claim is found allowable.

4. Rejection of claim 9 under 35 U.S.C. 103(a) as being unpatentable over Cheng in view of Bean et al. (US Pub. 2003/0074577):

Reconsideration of claim 9 is requested in view of the amendment to claim 1 and the explanation in item 2 above. Claim 9 is dependent and should be allowed if the corresponding independent claim is found allowable.

5. Rejection of claims 11 and 13 under 35 U.S.C. 103(a) as being unpatentable over Cheng:

Reconsideration of claims 11 and 13 is requested in view of the amendment to claim 1 and the explanation in item 2 above. Claims 11 and 13 are dependent and should be

allowed if the corresponding independent claims are found allowable.

6. Rejection of claims 14, 18, and 19 under 35 U.S.C. 103(a) as being unpatentable over Cheng in view of Brandt et al. (US 5,892,905):

In accordance with the amendment to claim 1, claim 19 is amended to recite "executing the security program with a computer to which the connection port is temporality connected". This limitation adds no new matter and should not require a new search or additional consideration since the claimed method is clearly for operating the claimed device.

Since Cheng uses the micro-controller 3 to execute the security program stored in the ROM 5, and since neither Cheng nor Brandt teach or suggest a portable microcontroller capable of parsing HTML, these two arts cannot be fairly combined to reject the amended claim 1. Indeed, as Brandt states, HTML is a well-known language that can be used by any computer on the market today, however, for combination Cheng's micro-controller 3 would be required to execute HTML. This is unobvious given the relatively small processing power of microcontrollers compared with computers.

Reconsideration of claims 14, 18, and 19 is requested in view of the amendments to claims 1, 15, and 19 and the explanations above and in item 2. Claims 14 and 18 are dependent and should be allowed if the corresponding independent claims are found allowable.

Sincerely,

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